

CAUSE NO. 20-0520-362

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| KINGDOM GROUP INVESTMENTS, INC., | § | IN THE DISTRICT COURT |
| <i>Plaintiff,</i> | § | |
| v. | § | 362ND JUDICIAL DISTRICT |
| MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., | § | |
| <i>Defendants.</i> | § | DENTON COUNTY, TEXAS |

DEFENDANT'S ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Mortgage Electronic Registration Systems, Inc. ("MERS"), Defendant in the above-styled and numbered cause, and files this Answer with Affirmative Defenses in response to Plaintiff Kingdom Group Investments, Inc. ("Plaintiff") Original Petition ("Petition"). In support of the foregoing, MERS would respectfully show the Court the following:

I.
GENERAL DENIAL

Pursuant to Rule 92 of the Texas Rules of Civil Procedure, MERS generally denies each and every allegation contained within Plaintiff's Petition and any amendments thereto and demands strict proof thereof as required by the Constitution and the laws of the State of Texas. MERS further reserves the right to plead further and in greater particularity as the case progresses.

III.
PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendant Mortgage Electronic Registration Systems, Inc. prays that Plaintiff's Petition be dismissed and that Plaintiff take

nothing by way of its claims. Defendant further requests that judgment be granted in its favor with respect to all claims asserted by Plaintiff, and for all further and other relief, whether at law or in equity, to which Defendant may be justly entitled.

Respectfully submitted,

By: /s/ Shelley L. Hopkins
Shelley L. Hopkins
State Bar No. 24036497
BARRETT DAFFIN FRAPPIER
TURNER & ENGEL, LLP - *Of Counsel*
3809 Juniper Trace, Suite 101
Austin, Texas 78738
(512) 600-4320
ShelleyH@bdfgroup.com
shelley@hopkinslawtexas.com

Robert D. Forster, II
State Bar No. 24048470
Crystal G. Gibson
State Bar No. 24027322
BARRETT DAFFIN FRAPPIER
TURNER & ENGEL, LLP
4004 Belt Line Road, Ste. 100
Addison, Texas 75001
(972) 386-5040
(972) 341-0734 (Facsimile)
RobertFO@bdfgroup.com
CrystalR@bdfgroup.com

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

Pursuant to Texas Rules of Civil Procedure, I certify that a true and correct copy of the foregoing has been sent on this the 14th day of February 2020 to all parties of record the method indicated below.

VIA E-SERVICE:

Kenneth S. Harter
Law Offices of Kenneth S. Harter
5080 Spectrum Drive, Suite 100-E
Addison, Texas 75001
ken@kenharter.com

ATTORNEYS FOR PLAINTIFF

/s/ Shelley L. Hopkins
Shelley L. Hopkins